

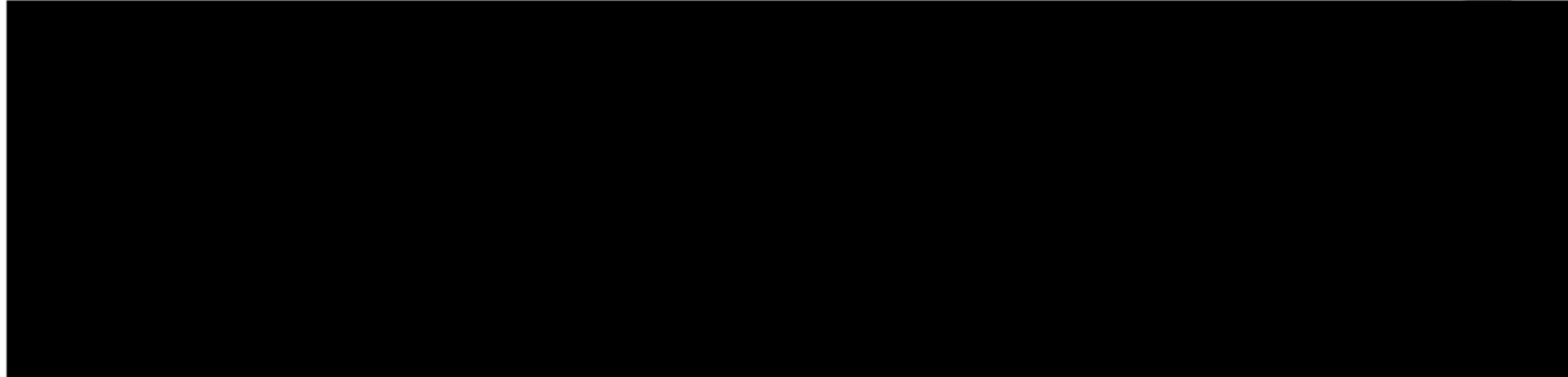
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IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.
JUDGE:

IN RE:

FORFEITURE OF THE FOLLOWING
DESCRIBED REAL PROPERTY



WILLIAM D. SNYDER, Sheriff of Martin County
DANIEL D. KERR, Chief of Police Jupiter P.D.
Petitioners

vs.

HUA ZHANG individually, and
SHENG LUO individually
Claimants

_____ /

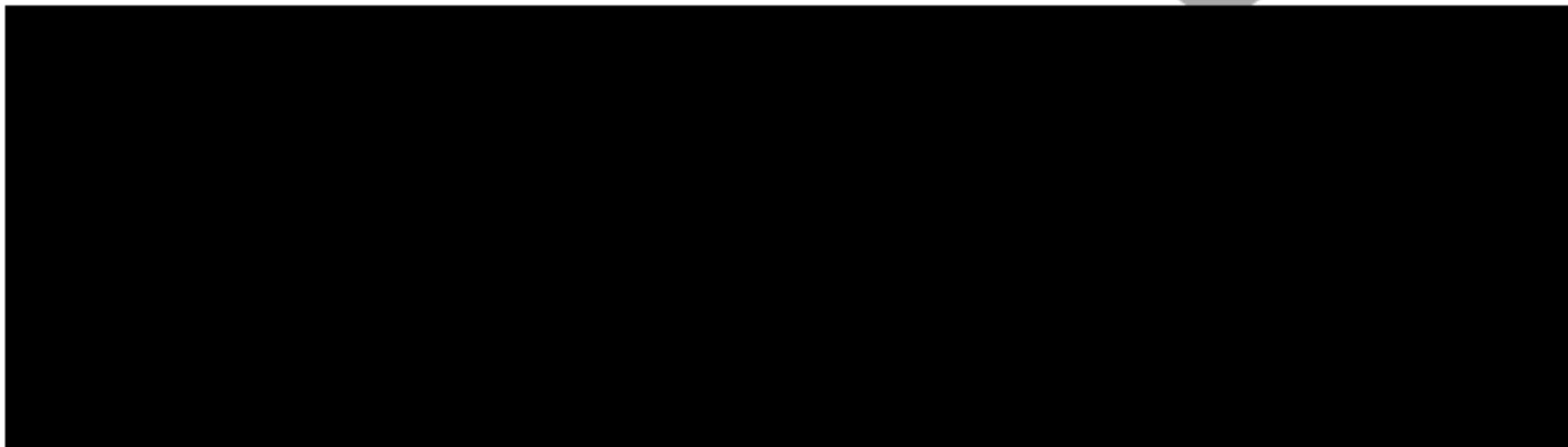
VERIFIED COMPLAINT FOR FORFEITURE
AND INCORPORATED APPLICATION FOR PROBABLE CAUSE

William D. Snyder, in his official capacity as the Sheriff of Martin County, Florida, and Daniel D. Kerr in his capacity as Chief of the Jupiter Police Department, Jupiter, Florida, by and through their undersigned Attorney, files this Verified Complaint for Forfeiture and Incorporated Application for Probable Cause for a Probable Cause Order and a subsequent Final Judgment of Forfeiture, and alleges:

1. This is an action in rem for forfeiture pursuant to Section 932.701 et. Seq., Florida Statutes (2017); jurisdiction is vested in this Court pursuant to Section 932.704, Florida Statutes (2017) commonly known and identified as “The Florida Contraband Forfeiture Act”

2. William D. Snyder is the Sheriff of Martin County, Florida and Daniel D. Kerr is the Chief of Jupiter Police Department in Palm Beach County both the Martin County Sheriff's Office and the Jupiter Police Department are “law enforcement agencies” as set forth in Section 932.704, Florida (2017).

3. A description of the properties that is subject of this action are as follows, to wit:



4. The real property described in Paragraph 3 above was used, is being used, or was attempted to be used as an instrumentality in the commission of, in aiding or abetting in the commission of Solicitation of Prostitution, deriving support from the proceeds of prostitution, renting space to be used for prostitution, maintaining a house of prostitution or which was acquired by proceeds obtained in violation of 796.059(1) and (2)(a) and/or 796.061(2)(a) and/or 796.07(2)(a) and (9)(f) and (5)(a)1 and/or 932.701 - .704 of the Florida Statutes (2017), or said real property, currency and property is “contraband article” as defined by Sections 932.701 (2) (a)1-11, Florida Statutes (2017).

5. That on or between October, 2018 and February 19, 2019, at or in the vicinity of Palm Beach County, Florida, within the jurisdiction of this Court, the property described in Paragraph 3 was used or possessed and or acquired by proceeds obtained in violation of 796.059(1)

and (2)(a) and/or 796.061(2)(a) and/or 796.07 (2)(a) and (9)(f) and (5)(a)1 and/or 932.701 - .704 of the Florida Statutes (2017), under the following circumstances which permit forfeiture pursuant to Sections 932.701 - .704 (2017):

a) Detective Andrew Sharp is a sworn Police Officer for the City of Jupiter, an incorporated municipality in the County of Palm Beach, State of Florida. Detective Sharp is a certified Law Enforcement Officer appointed to serve in that position since 2007.

b) Sergeant Christopher Morales is a duly appointed Deputy Sheriff, in and for the County of Martin, State of Florida. Sergeant Morales is a sworn, certified Law Enforcement Officer appointed to serve in that position since 2010.

c) Detective Sharp is assigned to the Criminal Investigations Division of Jupiter Police Department. He is responsible for the investigations of person crimes, and property crimes including robberies, burglaries, and sex crimes in violation of Florida Law.

d) Sergeant Morales is assigned to the Criminal Investigations Division (CID) of the Martin County Sheriff's Office. Among other duties, this division is charged with the responsibility of investigating criminal conduct and following up criminal reports of crime, in violation of Florida Law, concerning crimes against persons and property under Florida Law.

e) Detective Sharp and Sergeant Morales have successfully completed training courses and instruction in the elements of the crimes associated with the crimes against persons and property.

1. On or about February 19, 2019, Detectives from Jupiter Police Department, Martin County Sheriff's Office, and state, local, and federal law enforcement agencies executed multiple search warrants in connection with this case. Two search warrants were executed at businesses:

Sequoia Apple Day Spa, located at **10455 SE FEDERAL HIGHWAY #D2, HOBE SOUND FL 33455**; and Orchids of Asia Day Spa, located at **103 S. US HIGHWAY 1 SUITE C-2, JUPITER, FL 33477**. Both the Sequoia Apple Day Spa and the Orchids of Asia Day Spa are Florida for Profit Corporations. Sequoia Apple Day Spa is owned by Claimant Lei Wang as President and Registered Agent. The Orchids of Asia Day Spa is owned by Claimant Hua Zhang. Five search warrants were executed at residential real properties:

- [REDACTED] a title search of the property was conducted and revealed that the titled owner is Claimant, Lei Wang, individually.
- [REDACTED] a title search of the property was conducted and revealed that the titled owner is Claimant, GOLDEN LAKE INVESTMENT LLC, a Florida Limited Liability Company. The Manager and Registered Agent of the LLC are Claimant Sheng Luo. The second company Manager is Claimant Mei Zhang.
- [REDACTED] a title search of the property was conducted and revealed that the titled owners are Claimants Sheng Lao and Hua Zhang.
- [REDACTED] a title search of the property was conducted and revealed that the titled owner are Claimants Hua Zhang, Sheng Luo and Xuan Wu.
- [REDACTED] a title search of the property was conducted and revealed that the titled owner is Claimant Mei Zhang Investment LLC, a Florida Limited Liability Company, the Manager

and Registered Agent of the LLC are Claimant Sheng Luo. The second company Manager is Claimant Mei Zhang.

2. The search warrants were in culmination of a five month long investigation into a money laundering and prostitution organization operated by Claimants Zhang and Wang. During this investigation, both Detective Sharp and Sergeant Morales and members of Jupiter Police Department, Martin County Sheriff's Office, and other state and federal Law enforcement agencies conducted videotaped surveillance, covert investigations, and made multiple investigative traffic stops, from the activities of the Sequoia Apple Day Spa, Inc., and Orchids of Asia Day Spa, Inc. (Both companies are Florida for Profit Corporations). Claimant Lei Wang is the President and Registered Agent of Sequoia Apple Day Spa, Inc. Claimant Hua Zhang is the President and Registered Agent of Orchids of Asia Day Spa, Inc.

3. On or between the beginning of October 2018 and January 15, 2019 Detective Sharp and members of the Jupiter Police Department conducted surveillance on the Orchids of Asia Day Spa located at 103 S US Highway 1, Suite C2, Jupiter, FL. During the surveillance times only men were observed entering Orchids of Asia Day Spa. Detective Sharp and other Detectives conducted trash pulls from the garbage can behind the Orchids of Asia Day Spa. The Detectives were able to gather physical evidence that the specific garbage bags belonged to the Orchids of Asia Day Spa because of opened addressed mail and receipts to that specific address. Semen residue was discovered in napkins and tissues also in the same garbage bags. All the evidence was photographed, collected and stored by the Jupiter Police Department Crime Scene detectives.

4. On or between January 18, 2019 and January 23, 2019, following the approval of a search warrant issued by the 15th judicial circuit, several video cameras were installed to review in

real time and record any ongoing criminal activity that occurred inside Orchids of Asia Day Spa, located at **103 S. US HIGHWAY 1 SUITE C-2, JUPITER, FL 33477**. During the surveillance period twenty-six (26) criminal acts of prostitution (sexual acts in exchange for money) were observed and video recorded.

5. Bank records for Sequoia Apple Day Spa, Inc., Orchids of Asia Day Spa, Inc., Golden Lake Investment, LLC, Mei Zhang Investment LLC, and personal accounts of Claimant Lei Wang, Claimant Hua Zhang, Claimant Mei Zhang, and Claimant Sheng Luo were subpoenaed and reviewed. The records revealed that the monies received from the prostitution that occurred daily at the Orchids of Asia Day Spa, were used for the personal gain of Claimant Lei Wang and Claimant Hua Zhang. The Claimants used these proceeds of illegal activity (Solicitation of Prostitution, deriving support from the proceeds of prostitution, renting space to be used for prostitution and maintaining a house of prostitution) to continue the operations by paying the overhead of the Sequoia Apple Day Spa and Orchids of Asia Day Spa, pay prostitutes from another Martin County Day Spa as well as using the funds to purchase and upkeep properties in Orange County, Palm Beach County and Martin County.

6. On February 19, 2019, as part of the operation, Claimant Lei Wang was arrested for twenty-six (26) counts of Deriving Support from the Proceeds of Prostitution in violation of Section 796.05, Maintaining a Place and Engaging in Prostitution or Assignment in violation of Section 796.07 (2)(a), Renting space to be used for prostitution in violation of Section 796.061(2)(a), Florida Statutes (2017). Claimant Hua Zhang was arrested for twenty-six (26) counts of Deriving Support from the Proceeds of Prostitution in violation of Section 796.05, Maintaining a Place and Engaging in Prostitution or Assignment in violation of Section 796.07

(2)(a), Renting space to be used for prostitution in violation of Section 796.061(2)(a), Florida Statutes (2017).

7. Due to evidence obtained from the Florida Department of Economic Opportunity detectives determined that for the quarter ending December 2018, Claimant Zhang reported six thousand five hundred dollars (\$6,500.00) in revenue from Orchids of Asia Day Spa and Claimant Wang reported an additional four thousand five hundred dollars (\$4,500.00) in revenue from Orchids of Asia Day Spa. Investigation revealed that Claimant Zhang and Claimant Wang reported revenue from the Orchids of Asia Day Spa that was from illegal prostitution, and other illegal/illicit means. Therefore, the property located in Palm Beach County at [REDACTED] [REDACTED] was acquired, and upkeep and expenses paid by proceeds obtained in violation of 796.059(1) and (2)(a) and/or 796.061(2)(a) and/or 796.07 (2)(a) and (9)(f) and (5)(a)1 and/or 932.701 - .704 of the Florida Statutes (2017), or said property is a "contraband article" as defined by Sections 932.701 (2) (a)1-11, Florida Statutes (2017). A title search of the property located at [REDACTED] was conducted and revealed that the titled owners are Claimant Sheng Luo and Hua Zhang.

8. The real property described in paragraph 3 located at [REDACTED] [REDACTED] is not being used as homestead by Claimant Sheng Luo nor Claimant Hua Zhang, nor is there a homestead exemption filed on that property as verified by the Palm Beach County Property Appraisers Office.

9. Based upon the aforementioned facts listed in Paragraph 5, the following listed real property was seized as having been used in violation of the Florida Contraband Forfeiture Act. The real property was seized by filing a Notice of Lis Pendens in Palm Beach County, Florida:



William D. Snyder, as Sheriff of Martin County, Florida, and Daniel D. Kerr, as Chief of Jupiter Police Department, Jupiter, Florida acting by and through their authorized agents, representatives, or employees, has conducted a reasonably diligent search of all entities or persons who may have an interest in the property that is the subject of this action. Such search has revealed that the following persons or entities may claim an interest in the property that is the subject of this action by virtue of ownership, law, or by virtue of a lien purportedly perfected in the manner prescribed by law, to-wit:

HUA ZHANG




and/or

SHENG LUO



WHEREFORE, the Petitioners, William D. Snyder, in his official capacity as the Sheriff of Martin County, Florida, and Daniel D. Kerr, in his official capacity as Chief of Jupiter Police Department by and through his undersigned Legal Advisor, requests that this Court issue an Order establishing probable cause, ex parte, and requiring the claimant to file responsive pleadings and affirmative defenses and upon due proof being presented to enter a Final Judgment of Forfeiture


awarding the real property to William D. Snyder, in his official capacity as the Sheriff of Martin County, Florida and Daniel D. Kerr in his official capacity as Chief of Jupiter Police Department, for their disposal according to law, pursuant to the Florida Contraband Forfeiture Act, and that all right, title, and interest in and to such property, relating back to the date of seizure, be perfected in the Petitioners.



GLENN R. THEOBALD, ESQ.
Chief Deputy/Legal Advisor
Martin County Sheriff's Office
Florida Bar No. 0568031
800 S.E. Monterey Road
Stuart, Florida 34994-4599
Telephone: (772) 220-7002
Fax: (772) 320-4747
grtheobald@sheriff.martin.fl.us

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Petitioner's Verified Complaint for Forfeiture and Incorporated Application for Probable Cause was sent via U.S. mail on this 26 day of February, 2019, HUA ZHANG at 15248 Evergreen Oak Loop, Winter Garden, FL 34787 and SHENG LUO at 15248 Evergreen Oak Loop, Winter Garden, FL 34787



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AFFIDAVIT

STATE OF FLORIDA
COUNTY OF PALM BEACH

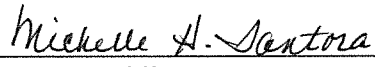
DETECTIVE ANDREW SHARP, a duly certified LAW ENFORCEMENT OFFICER employed by the Jupiter Police Department, Jupiter, Florida, being duly sworn deposes and says that the facts contained in the foregoing VERIFIED COMPLAINT FOR FORFEITURE are based upon personal knowledge and are true and accurate.



DETECTIVE ANDREW SHARP

SWORN TO AND SUBSCRIBED before me this 27th day of February, 2019 by
DETECTIVE ANDREW SHARP.





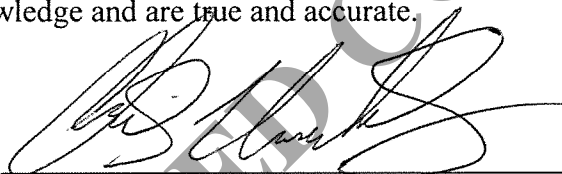
Notary Public
Printed Name: MICHELLE H. SANTORA
My Commission Expires: 4.28.2022

Personally known X or produced identification _____.
Type of identification provided _____.

AFFIDAVIT

STATE OF FLORIDA
COUNTY OF MARTIN

SERGEANT CHRISTOPHER MORALES, a duly certified LAW ENFORCEMENT OFFICER employed by the Martin County Sheriff's Office, Stuart, Florida, being duly sworn deposes and says that the facts contained in the foregoing VERIFIED COMPLAINT FOR FORFEITURE are based upon personal knowledge and are true and accurate.



SERGEANT CHRISTOPHER MORALES

SWORN TO AND SUBSCRIBED before me this 27th day of February, 2019 by
SERGEANT CHRISTOPHER MORALES.



MICHELLE H SANTORA
Commission # GG 188968
Expires April 28, 2022
Bonded Thru Budget Notary Services

Michelle H. Santora

Notary Public

Printed Name: MICHELLE H. SANTORA

My Commission Expires: 4.28.2022

Personally known X or produced identification _____.
Type of identification provided _____.